

RUSS, AUGUST & KABAT

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Attorneys for Plaintiff
2-WAY COMPUTING, INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

2-WAY COMPUTING, INC., a Nevada
corporation,

Plaintiff,

vs.

MITEL NETWORKS CORPORATION, et al.,

Defendants.

Case No. 15-cv-02236-MMD-NJK

**UNOPPOSED MOTION AND
[PROPOSED] ORDER TO EXTEND
DEADLINE FOR DEFENDANTS TO
RESPOND TO COMPLAINT**

(First Request)

Plaintiff 2-Way Computing, Inc. ("2-Way") hereby files this Unopposed Motion and [Proposed] Order to Extend Deadline for Defendants Mitel Networks Corporation and Mitel (Delaware), Inc. (collectively, "Mitel") to Respond To Complaint. This request complies with Local Rules ("LR") 6-1, 6-2, and 7-1. The litigation of this matter will be best served by the proposed extension. This is the first request to extend the response deadline. This request is not made after the response deadline.

The Complaint [Doc. No. 1] was filed on November 25, 2015. Mitel (Delaware), Inc. was served with the summons and complaint on February 23, 2016. The current deadline to respond to the Complaint is March 15, 2016.

As a part of this request to extend Mitel's deadline, Defendant Mitel Networks Corporation, a Canadian corporation, has agreed to waive service in this case.

Pursuant to discussions between 2-Way and Mitel, both parties are agreeable to an extension of time for Mitel to investigate the allegations of the Complaint. 2-Way agrees to extend the deadline for Mitel to respond to the Complaint for an additional sixty (60) days, until May 16, 2016. Because an attorney for Mitel has not made an appearance in the case yet, 2-Way files this motion to extend Mitel's deadline as an unopposed motion.

Accordingly, Plaintiff respectfully request that the Court grant this request to continue the deadline for Defendants to respond to the Complaint.

Respectfully submitted,

DATED: March 14, 2016

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By: /s/ C. Jay Chung

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Attorneys for Plaintiff
2-WAY COMPUTING, INC.

ORDER

IT IS SO ORDERED.

DATED: March 15, 2016


United States Magistrate Judge

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing document has been served on March 14, 2016 to all counsel of record via the Court's CM/ECF system.

Dated: March 14, 2016

/s/ C. Jay Chung

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